

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§ § § § § § §	<b>Chapter 11</b>
<b>FIELDWOOD ENERGY III LLC, <i>et al.</i>,</b>	§	<b>Case No. 20-33948 (MI)</b>
<b>Post-Effective Date Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>

**STIPULATION EXTENDING DEADLINE  
FOR THE PLAN ADMINISTRATOR TO RESPOND TO THE APPLICATION OF  
COX ENTITIES FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM**

This stipulation and order (the “**Stipulation and Order**”) is entered into by and between (i) Cox Oil, LLC, Cox Operating LLC, Energy XXI GOM, LLC, Energy XXI Gulf Coast, Inc., Energy XXI Onshore, LLC, Energy XXI Pipeline, LLC, Energy XXI Pipeline I, LLC, Energy XXI Pipeline II, LLC, M21K, LLC and EPL Oil & Gas, Inc., on behalf of themselves and their applicable affiliates (the “**Cox Entities**”), and (ii) the Plan Administrator in the above-captioned case (together with the Cox Entities, the “**Parties**”). The Parties hereby stipulate and agree as follows:

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “**Post-Effective Date FWE I Subsidiaries**”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

WHEREAS, commencing on August 3, 2020, each of the Debtors filed a voluntary case under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”);

WHEREAS, on June 25, 2021, the Bankruptcy Court entered its *Findings of Fact, Conclusions of Law, and Order (I) Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors and (II) Granting Related Relief* (ECF No. 1751) confirming the Fieldwood Debtors’ *Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* (ECF No. 1742) (as modified at ECF No. 2008, the “**Plan**”);<sup>2</sup>

WHEREAS, the Effective Date of the Plan occurred on August 27, 2021;

WHEREAS, on October 11, 2021, Cox filed its *Application of Cox Entities for Allowance of Administrative Expense Claim* (ECF No. 2082) (the “**Cox Application**”), which seeks entry of an order requiring payment of certain post-petition, pre-effective date amounts;

WHEREAS, the deadline to respond or object to the Cox Application is November 1, 2021 (the “**Response Deadline**”); and

WHEREAS, the Plan Administrator has requested, and Cox has agreed, to extend the Response Deadline as set forth herein.

**NOW, THEREFORE**, in consideration of the foregoing recitals, which are incorporated into this Stipulation and Order, the Parties hereby stipulate and agree as follows:

1. The Response Deadline is extended to the later of (i) 11:59 p.m. (prevailing Central time) on December 6, 2021, and (ii) 11:59 p.m. (prevailing Central time) on the date that is three (3) weeks after the date on which Cox or its counsel has provided the Plan Administrator or its

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Plan.

counsel with all of the documents that Cox will rely on in support of the claims asserted in the Cox Application.

2. The time periods set forth in this Stipulation and Order shall be calculated in accordance with Rule 9006(a).

3. This Stipulation and Order shall constitute the entire agreement and understanding of the parties relating to the subject matter hereof and shall supersede all prior agreements and understandings relating to the subject matter hereof.

4. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation and Order.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2021

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HON. MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

IN WITNESS WHEREOF, this Stipulation and Order has been executed and delivered as of the day and year first below written.

Dated: November 1, 2021

/s/ Michael B. Kind

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